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IN THE

Supreme Court of the United States

OCTOBER TERM, 1952

No. 226

J. LAURITZEN,

Appellant,

against

EVALD JOHANN LARSEN,

Appellee.

BRIEF OF AMICI CURIAE ON BEHALF OF PETTER D. PEDERSEN ET AL. AND CONSENT TO FILE

HARRY D. GRAHAM,
Counsel for Amici Curiae.

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CONSENT TO FILE BRIEF AS AMICI CURIAE PURSUANT TO RULE 27, PARAGRAPH 9(a) OF THE RULES OF THE UNITED STATES SUPREME COURT

The undersigned, counsel for appellant and counsel for appellee, hereby consent to the filing of the brief herein by Harry D. Graham as counsel for Petter D. Pedersen et al. of amici curiae.

Dated, New York, N. Y.,
November 24, 1952.

James M. Estabrook
~~HAIGHT, DEMING, GARDNER, POOR & HAVENS.~~
Counsel for Appellant.

RICHARD M. CANTOR,
ARCHIBALD MCGRATH,
Counsel for Appellee.

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BRIEF AS AMICI CURIAE OPPOSING APPELLANT

The undersigned, as counsel for Petter D. Pedersen et al., respectfully files as amici curiae the accompanying brief with consent of the appellant and appellee pursuant to Rule 27, paragraph 9(a) of the Rules of this Court.

Preliminary Statement

The fundamental issue presented by this case is the extent of coverage of Sec. 33 of the Merchant Marine Act of June 5, 1920, 41 Stat. 1007, Title 46 U. S. Code, Sec. 688, commonly known as the Jones Act.

In order to properly answer this question, the intent of the Congress at the time of its enactment must be determined.

Thirty-eight years ago, on June 28, 1914, from the underbelly of Europe, the echos of shots reverberated throughout the world. To the day, a month later, war in Europe broke out.

Within a few months thereafter this nation, whose merchant fleet was composed of only a few nondescript craft mostly of sail, suddenly found itself deprived and virtually stripped of the foreign flag facilities upon which American industry for decades had relied and depended for the transportation of its exports and imports. To remedy this situation and to prevent such a recurrence, steps were taken by the Congress for the enactment of suitable legislation intended to develop an American merchant marine which would render this nation independent of foreign carriers and at the same time constitute an effective auxiliary to our naval force.

The following year, 1915, in accord with its declared intent, the Congress enacted the Seamens Act of 1915 and thereby became the first nation in the world to liberate and emancipate the seaman from the shackles of serfdom and involuntary servitude and confer upon him some protective welfare measures and thus attract young men to the sea to man this planned merchant marine. As part of this general legislation it modified the "Half-Wage Law" (Title 46 U. S. Code 597), making its provisions applicable and enforceable in our courts for the welfare of seamen on board all vessels in our ports, irrespective of the seamen's nationalities or the flag of the vessel, thereby enabling alien seamen to leave their foreign flagged vessels in our ports and help man this planned fleet.

In 1916, pursuing its declared intent of building up an American merchant marine, the Congress then enacted the Shipping Act of 1916, providing for the welfare of potential owners of this fleet which would come to pass. It established, in effect, Limitation of Owners Liabilities, a code for shipping, and granted official recognition to certain trade practices while declaring others illegal. To regulate and control this planned merchant fleet, the Congress created a United States Shipping Board and, realizing the impossibility of private capital to provide an adequate merchant marine except over a long period of years, it also created the Emergency Fleet Corporation as the

agency of the government for the construction and operation of the vessels of this planned fleet.

In 1917 this nation entered the conflict now known as World War I. The vessels then built and acquired by this nation for the merchant service were not only manned by such American Seamen as were available but were manned by men of every nationality (enemy alien excepted), race and creed.

The immigration laws (Title 8 U. S. Code 376) (40 Stat. 544, as amended May 9, 1918) were liberalized to encourage alien seamen to man this fleet because of the lack of adequate American seamen, and they were granted the protections to which American citizens were entitled.

At the close of World War I, the Emergency Fleet Corporation had acquired some 3,000 ocean-going steamships and the twilight was closing upon the era of sail.

In 1920 the Congress, again declaring that its intent and the purpose of the legislation was to encourage the upbuilding of a privately owned and operated American merchant marine, enacted the Merchant Marine Act of 1920. By this Act it carried forward the regulatory features of the 1916 Act, the Seamen's Act of 1915, provided for the establishment of trade routes and the employment of these vessels therein by the Shipping Board and provided certain other attractive features in order to encourage, and ultimately transfer to, private American ownership. It enacted the Suits in Admiralty Act on March 9, 1920, following with the High Seas Death Act, without distinction as to flag or alienage, on March 30, 1920. On June 20, 1920, the very same Congress enacted legislation (46 U. S. Code 882) permitting the carriage of a limited number of passengers upon cargo vessels, exempting the carrier from "passenger vessel" regulations and bestowing this same privilege upon cargo vessels of foreign flag provided the same privilege was granted to American vessels by that foreign country, otherwise restricting such foreign vessels. Following its declared intent, as noted by this Court in *Detroit Trust Co. vs Barlum Steamship Co.*, 293 U. S. 21, the Congress on the same day enacted the Ship Mortgage

Act and Lien Act of 1920 (46 U. S. Code Secs. 911-984), making the lien features thereof (Sec. 971) applicable to every vessel, regardless of nationality. On the same day the Congress amended the defective Seamen's Act of 1915 (46 U. S. Code 688) by enacting what is commonly known as the Jones Act, setting up therein the respective rights, duties and liabilities between employers and seamen, without distinction as to flag or nationality.

Argument

POINT I

The Jones Act is equally applicable to all operators and seamen, regardless of nationality, whenever the vessel, regardless of flag, is operated from our ports in competition with the American Merchant Marine.

Just as Congress in 1914 declared its intent to free this nation from dependence upon foreign operators for the carriage of our imports and exports and to encourage and build a strong, healthy merchant marine of our own, so has each succeeding Congress reiterated that statement in the succeeding thirty-eight years of shipping legislation.

It must be remembered that, just as in the recent conflict, in World War I the allied fleet was composed of vessels of many flags and seamen of many nationalities. In assigning crew members and replacements, no distinction as to the nationality of the crew member or the vessel's flag was made. Indeed, replacements of crew members were made with whatever seamen were available, regardless of nationality, in order to fully prosecute the war, just so long as the seaman was loyal to the cause. Cf. *The Santa Elena*, 271 F. 347, 349.

The powers of Congress over foreign vessels in our ports was fully considered in *Patterson* v. *The Eudora*, 190 U. S. 169, which reviewed decisions of this Court prior thereto

and which case was later referred to in *Strathearn* v. *Dillon*, 252 U. S. 348.

It is well settled that this government then, as now, had the power to determine upon what terms and conditions vessels of other countries might be permitted to enter our harbors to conduct business and to impose conditions upon the shipment of sailors regardless of nationalities in our own ports and make them applicable to foreign as well as domestic vessels.

And, as this Court stated in *Strathearn* v. *Dillon*, supra, there can be no doubt as to the authority of Congress to pass statutes applicable to foreign vessels in our ports and controlling the *employment* and payment of seamen as a condition of the right of such foreign vessels to enter and use our ports.

The Jones Act, as is so clearly reflected therein, is simply a statute regulating the relationship of employer to employee in the waterborne phase of a particular industry—the shipping industry. It confers upon any seaman within our jurisdiction an additional right of action to that which he may have under the general maritime law and the High Seas Death Act by virtue of his relationship of employee to employer for injuries sustained in the course of his employment, without distinction as to his nationality, the flag of the vessel or the nationality of the employer.

The general terms used by the Congress, as will be illustrated, were wisely chosen. Had it been the intent of Congress to exempt foreign operators and foreign vessels from this protective welfare act, it could very simply have so stated.

Through the years following the conflict of World War I, alien seamen have pursued their calling from our shores and many who served valiantly in World War I did likewise in the recent conflict. Following the legislative history of shipping since 1920, we find Congress, still reiterating its declared intent of 1914, enacting the Merchant Marine Act of 1928 to encourage private ownership of the government's fleet by a mail subsidy plan to cover their higher opera-

tional differential to that of the foreign operator. During the early part of the 1930s this nation had developed a sizeable trained seafaring people of its own and maritime labor organized into trade unions.

In 1936, reiterating its previous declarations of intent, and with pressures from organized maritime labor because of the unhealthy economic situation in the industry, Congress enacted its first legislation restricting alien merchant seamen for the manning of our vessels to 25% of the crew, exclusive of the licensed personnel (46 U. S. Code Sec. 672a). On vessels owned and operated for the government's account, alien seamen thereon were limited to those provided in Sec. 1132, U. S. Code Title 46, known as the Merchant Marine Act of 1936, subject to suspension thereof by the President in the event of a national emergency.

When the tempo of shipping increased in the early forties, prior to our entry into the last conflict, shipping pools were set up for the recruitment of merchant seamen to man our ships. This nation, in its vast set-up, used vessels of every flag and seamen of every nationality who could be depended upon for their loyalty. These seamen were not kept ashore until a vessel chancing to fly the flag of his nationality appeared with a vacancy on board, but they were shipped in chronological rotation upon vessels of many flags. The crews, as in the first war, were invariably composed of many nationalities. Many were injured, torpedoed and killed in the performance of their tasks and in the tradition of the sea without distinction as to flag of vessel or nationality of the seaman. Indeed, even this government had transferred vessels to the Panamanian and other flags in order to circumvent the restrictive manning statutes respecting government-owned vessels and make the utmost use of alien seamen in our cause. Cf. *Carroll* v. *U. S. and Waterman S.S. Co.*, 1943 A. M. C. 339, where the government-owned steamship the *Gallant Fox* was operated under the Panamanian flag and a seaman, a citizen of Eire, was injured thereon during the last war.

As after the First War, so after this last war, alien seamen have pursued their calling from our shores as permitted by our laws and, with the economic depression in shipping, which follows every war, they seek employment, true to their lot and calling, upon anything that floats in order to have some sort of shelter and food.

During and since the past war, tremendous transfers of registry to foreign flags have been resorted to by American citizens in efforts to escape taxes and to evade the safety, welfare and wage laws of this nation. On the other hand, many foreign nationals enter this country with six months business visas, renewable each six months, and for the same purposes organize Panamanian corporations, contract with an operator to operate their foreign flagged vessels for them as "agents", hire and fire their crews within our ports and, when a seaman becomes injured turn him ashore in our land helpless and broken unless he agrees to accept the mere pittance provided by the laws of the country whose flag the vessel chanced to fly. Keen competition among the governments of Panama, Honduras, Nicaragua and Liberia exists in their endeavors to attract shipowners to use their respective flags. Latest, to join the ranks, is Morocco.

Petter D. Pedersen, one of amici curiae herein, is one of many illustrations. He is a Norwegian seaman, 20 years old who, in the port of New York on February 20, 1951, was hired and engaged to serve as wireless operator on board the steamship *Adriatica* flying the Greek flag for $200 per month. This vessel, as indicated in Lloyds Register of Shipping, is listed as being owned by one A. P. Anastassatos, a Greek subject, residing in New York and operating this vessel from an office located in 80 Broad Street, New York City.

The *Adriatica* is a former American vessel, of the Lake type built back in 1919, declared obsolete for our merchant marine, and approved by the Maritime Commission for transfer and sale to foreign interests and registry which came to pass.

Pedersen joined the vessel in the United States, sailed with her until December 28, 1951 when he was discharged in Baltimore and shortly thereafter entered the U. S. Marine Hospital where he now remains receiving treatment for moderately advanced pulmonary tuberculosis which he developed on the *Adriatica* because of unhealthy conditions far below American standards.

Her crew was composed of men of many different nationalities with no common tongue among them. Nor did Pedersen know anything about the Greek language. Unlike American ships, this vessel had no formal articles of agreement. Though engaged in commerce between the United States and foreign countries, her cargoes were, and this very day are, solicited in the United States; her freights are payable in American currency in the United States and everything in connection with her operations originates in the United States, including recruitment of her crews.

Under the Commercial Law of Greece, the nation whose flag the *Adriatica* flies, this sailor would be entitled to receive four months wages plus his medical expense and lodging for a maximum of four months duration. He has been an in-patient at the U. S. Marine Hospital for ten months at this writing. To apply the law of the flag, as this appellant would have this Court do, would have the effect of dismissing this alien seaman from the hospital after four months had elapsed even though he required medical care, with no recourse.

Carlos Murillo, another of amici curiae, was a Honduran seaman who, in the port of New York, was engaged to serve on board the steamship *Norlandia*, flying the *Honduran* flag, as a fireman at 36 *British* Pounds Sterling per month. Lloyds Register of Shipping indicated the registry of title to this vessel in the name of one Silet Cia de Vapores, S.A. of *Panama*. The parties in interest, controlling Silet Cia de Vapores were *Greek* nationals who, after the conclusion of the late war, entered this country on six month business visas, renewable from time to time and who reside in the State of New York. To further confound the situa-

tion, the Articles of Agreement between the Master and crew were written in *English* and provided that only *American* holidays, while the vessel was in port, would be considered as legal non-working days and that insofar as the owners' (an ostensible Panamanian corporation) liability "as regards treatment, maintenance and compensation" was concerned, the same "is to be settled in accordance with the provisions of the *Greek Merchant Shipping Law*". Though this vessel flew the Honduran flag, of a crew of 31 men only two of them, Murillo and one other, were Honduran subjects. Her crew was a conglomeration of Greek, Turkish, Uruguayan, Belgian, Ecuadorian, Portuguese, Egyptian, Colombian, West Indian and Syrian nationals all of whom were recruited in the United States and who signed articles in the Port of Philadelphia. The log books of the vessel were kept in the *Greek* language though it flew the *Honduran* flag.

Murillo was injured on board this vessel while she was in a port of Brazil and returned with the vessel to Philadelphia where he, and other members of the crew were paid off. Suit was commenced in the Southern District of New York (*Murillo* v. *Silet, etc.* Civ. No. 66-359) and the defendants, as a defense, pleaded the *Greek law* and, in the alternative; the law of the flag, *Honduras*. This cause was tried immediately previous to the case now before this Court by the same Judge with a jury who struck the defenses of *Greek or Honduran law* and applied the Jones Act and general maritime law.

Cecil Lazarus, of amici curiae, a national of *Trinidad, B. W. I.*, was engaged in the City of New York on May 24, 1949 to serve on board the steamship *Sandwich* flying the *Panamanian* flag as an able-seaman at $90 per month (American), joining the vessel at New York. Lloyds Register of Shipping indicated this vessel's title as being registered in the name of one Cia Aviade Vapores, S.A. of *Panama*. Lazarus was hired by one International Maritime Corp., a domestic corporation of the State of New

York, who contended that they acted merely as "agents" for Cia Avia de Vapores, S.A.. . Investigation revealed that the stock of both companies was held by American citizens and principally controlled by one John Tyreas, an American citizen, who actually did the hiring, firing and operating of this vessel from our shores in competition with American shipping.

In the port of Pensacola, Florida, Lazarus was injured on board the vessel while performing his duties. He was carried to sea despite his injuries and sent to a clinic in Cuba for examination. He was compelled to stay with the vessel and perform his duties with the result that when the vessel reached Baltimore his condition had become worsened and because of his weakened condition and lameness, he sustained further injury so that he had to be hospitalized in that port, and was paid off from the vessel.

Like the previous situations, this vessel was crewed with a conglomeration of different nationals who were hired in the United States. Her articles were in *English* and provided therein that in the event of illness or injury the crewmembers agreed to be governed by the law of the *Republic of Panama.* As is customarily the case, the crew of many tongues did not know what they were signing when they signed the Articles.

Thus, at 52 Broadway in the City of New York, is an American partnership named Simpson, Spence & Young. This firm are ostensible "agents" and actually operate many foreign flagged vessels, for the accounts of their owners, in competition with American facilities. On the tenth floor of this building, will be found tiny cubby-hole offices, in rows, with no identifications upon the doors. Behind the doors, sit the real parties interested in these foreign flagged vessels all neatly residing in New York by virtue of business visas. They set up no operating staff but make use of the very efficient operations, accounting, payroll and seamen's employment staffs of Simpson, Spence

& Young to whom they pay a fee for such services and space. Their cargoes are solicited and their freights are paid within the United States. Their bank accounts are maintained in the United States. To procure a foreign flag, one need not go to the country whose flag is desired. That is simply a "fee matter" handled by the Consulate of the country whose flag is desired and is accomplished without leaving the City of New York. Similar domestic firms, such as Orion Shipping & Trading Corp. of 80 Broad Street, New York City; Caras (U. S. A.) Ltd. of 27 West Street, New York City; North Atlantic Shipping & Trading Co. of 52 Broadway, New York City and Mar-Trade Corp. of 44 Whitehall Street, New York City operate in similar fashion.

Of these, Simpson, Spence & Young, conservatively speaking, handle about 100 of such foreign flagged vessels, while Orion Shipping & Trading Corp. handle about 150 in competition with American shipping.

In the instant case before the Court, the appellant is in no better position than those illustrated. If anything, he is in worse position.

Thus, in *Grace Line—West Coast Pooling Agreement*, reported in *1940 A. M. C. 1515* wherein counsel for the appellant herein, represented the Lauritzen interests there, we find the modus operandi of Lauritzen which continues to this very day. There we find *West Coast Line* to be a *joint operation* by West Coast Line, Inc., Wessel-Duval & Co., Inc., both domestic corporations, and J. Lauritzen, the appellant. All vessels in the service of West Coast Line were Danish vessels supplied by Lauritzen. In *Shipping Digest*, a national shipping weekly we find "West Coast Line" Advertising itself as carrying on a "regular and direct service *from*" ports of the United States "to the Canal Zone" and ports on the West coast of South America *since 1825* (Exhibit 1). An examination of Lloyds Register of Shipping and the American Bureau of Shipping Register fails to reveal any vessels owned by West Coast Line or West Coast Line, Inc. either currently, in 1946 when appellee was injured, or in 1940. From the

New York *Journal of Commerce* under date of July 22, 1946, immediately prior to plaintiff-appellee joining the *Randa* we find West Coast Line advertising its direct service from New York to the west coast of South America listing the vessels used by it for such service, with their sailing dates (Exhibit 2). An examination of Lloyds Register of Shipping for 1946, as well as today, reveals that beside the *Randa*, all of the other vessels, scheduled by West Coast Line in this service, are registered in the name of J. Lauritzen and fly the Danish flag.

Indeed, Wessel-Duval & Co., Inc., West Coast Line, Inc. and Lauritzen maintain common offices in New York City. An examination of the 1952-53 New York Telephone Directory reveals:

Wessel Duval & Co., Inc.—67 Broad Street—WHitehall 3-9600
J. Lauritzen, agency—67 Broad St.—WHitehall 3-9600
West Coast Line, Inc.
Main Office—67 Broad St.—WHitehall 3-9600
Maintenance Dept.—90 Broad St.—WHitehall 4-4513
J. Lauritzen, Inc.—90 Broad Street—WHitehall 4-4153

In short, West Coast Line, Wessel-Duval & Co., both domestic companies and J. Lauritzen have maintained for many years a joint venture in the United States, with Lauritzen supplying the vessels, in a regular scheduled trade route from the United States to the West Coast of South America (Exhibit 3). This operation has, and continues to be, run in competition with an old American steamship operator, the Grace Line, Inc. who uses American flagged vessels and who, in order to maintain its operation on this route must be, and is, subsidized by the United States Government, at the expense of the American taxpayer, because of the higher operating cost differential of its American flagged vessels.

The general words of the Jones Act, selected by the Congress, were wisely chosen with a great deal of foresight consonant with its oft-repeated declaration of intent of creating, fostering and building an American merchant marine so that never again, as in 1914, would this nation be left without adequate means of transportation when foreigners decided to withdraw their vessels from our harbors and the market.

For, as the Foreign Trade Division of the United States Bureau of Census records reveal, from 1900 until our plight of 1914 occasioned by the withdrawal of foreign tonnage from our ports, our imports and exports were carried by 78% foreign bottoms, as compared with 22% in American bottoms. By 1920, with government military cargoes and government owned vessels, we were transporting 51% of our own commodities and, in the years following, until 1940, we find a gradual decline to 26% bringing us back to conditions approximating pre-World War I. Even in 1943, 51% of our materials was being carried in foreign bottoms and not until 1945 did we reach the peak of 65% being carried in American flagged vessels. By 1949, we had again declined to 48% and the latest figure released for 1951 reveals that we had dropped to 41% and, at this writing, were it not for the Korean situation, American shipping would be worse off than it was in 1914.

A casual glance through any current newspaper's marine data section, or the Journal of Commerce, will reveal that insofar as American flagged shipping is concerned a famine exists and that what cargo exists, other than government cargo, is being carried in foreign bottoms. The daily entries and clearances from such journals will reveal them to be preponderantly foreign flagged vessels.

The foregoing material is illustrative and is factually based upon public documents and records, the writer's personal experience at sea since 1924 in every capacity from messboy to master, and as operations manager and owner/operator ashore. It is also based upon samplings of actual

cases of alien seamen, as illustrated, and personal investigation by the writer whose seamen's matters handled by him consist of virtually 85% alien seamen. Those illustrated are merely indicative of thousands of like circumstances.

That Congress, in enacting the Jones Act, intended thereby to exempt from its obligations foreign vessels and operators using our ports as bases of competitive operations with our own hard built American fleet and thereby confer upon them a distinct competitive advantage in operational costs, at the expense of the American vessel and taxpayer, would be a conclusion repugnant to Congress's oft-repeated declaration of intent and without foundation in the statute either actual or implied.

Nor is it conceivable that Congress, at a time when a tremendous number of alien seamen were aiding in the manning of our ships during the first War, when the Act was before it, and who, by tradition and custom would be pursuing their callings and engaged from our shores at the close of that war and thereafter, intended to exclude alien seamen from the Act's benevolent protection.

CONCLUSION

The decision and judgment of the United States Court of Appeals for the Second Circuit should be affirmed in all respects.

Dated, New York, N. Y.
November 24, 1952.

Respectfully submitted,

HARRY D. GRAHAM,
Counsel for Amici Curiae.

Exhibit 1

SHIPPING DIGEST
November 17, 1952
(Page 58)

WEST COAST LINE
U. S. A. to West Coast of South America
Since 1825

Regular Direct Service From
NEW YORK — PHILADELPHIA — BALTIMORE
Regular Direct Service From
NEW ORLEANS — GULF PORTS
to
CANAL ZONE, PANAMA, COLOMBIA, ECUADOR, PERU,
BOLIVIA and CHILE

WEST COAST LINE, INC.

67 Broad Street
New York 4, N. Y.
WHitehall 3-9600

309 Carondelet Bldg.
New Orleans, La.

Exhibit 2

THE JOURNAL OF COMMERCE
and Commercial
New York, Monday, July 22, 1946
(Page 20)

WEST COAST LINE, INC.

Direct Service to

COLOMBIA, ECUADOR, PERU, CHILE

	Sails
S.S. Randa	July 24
S.S. Lotta Dan	Aug. 10
S.S. Karla Dan	Aug. 27
S.S. Laila Dan	Sept. 11

Loading berth Pier 46, New York Docks, Brooklyn.

Calling direct at Buenaventura, Guayaquil, Pimentel, Callao, Mollendo, Antofagasta, Valparaiso, and other ports as cargo offers.

For information apply

WEST COAST LINE, INC.

67 BROAD STREET, NEW YORK — DIGBY 4-9600

Exhibit 3

JOURNAL OF COMMERCE

New York, Friday, September 5, 1952

(Page 20)

WEST COAST LINE

Direct Service to

CANAL ZONE, PANAMA, COLOMBIA, ECUADOR, PERU, BOLIVIA and CHILE

Loading Berth: Pier 4, New York Docks, Brooklyn

Bella Dan ..... New York, Sept. 17
(B. Knudsen)
Baltimore, Sept. 5
Philadelphia, Sept. 8

Cristobal (Colon), Balboa (Panama City), Buenaventura, Guayaquil, Paita, Pimentel, Callao, Mollendo, Arica, Antofagasta, Valparaiso.

Greta Dan ..... New York, Oct. 1
(C. Nielsen)
Baltimore, Sept. 22
Philadelphia, Sept. 23

Cristobal (Colon), Balboa (Panama City), Buenaventura, Guayaquil, Pimentel, Callao, Mollendo, Arica, Antofagasta, Valparaiso.

Paula Dan ..... New York, Oct. 15
(A. Roesen)
Boston, Sept. 26
Baltimore, Oct. 6
Philadelphia, Oct. 7

Cristobal (Colon), Balboa (Panama City), Buenaventura, Guayaquil, Pimentel, Callao, Mollendo, Arica, Antofagasta, Valparaiso.

From Gulf Ports

Tessa Dan.....New Orleans, Sept. 18
Mobile, Sept. 9
Galveston, Sept. 11
Houston, Sept. 12

Cristobal (Colon), Balboa (Panama City), Buenaventura, Guayaquil, Paita, Callao, Mollendo, Arica, Antofagasta, Valparaiso, Talcabuano.

Vilma Dan.....New Orleans, Oct. 3
Mobile, Sept. 25
Galveston, Sept. 27
Houston, Sept. 29

Cristobal (Colon), Balboa (Panama City), Buenaventura, Guayaquil, Callao, Mollendo, Arica, Antofagasta, Valparaiso, Talcabuano.

For information apply

WEST COAST LINE, INC.

67 Broad Street, New York WHitehall 3-9600
309 Carondelet Bldg., New Orleans Tulane 6751

Agents

Philadelphia	Stockard & Co., Inc.
Baltimore	Stockard & Co., Inc.
Chicago	Kerr Steamship Co., Inc.
St. Louis	Kerr Steamship Co., Inc.
Detroit	Kerr Steamship Co., Inc.
Montreal	Kerr Steamship Co., Inc.
Milwaukee	General Steamship Agencies, Inc.
New Haven	Roger Neidlinger
Memphis	Biehl & Co.
Mobile	Page & Jones
Galveston	Thomas Rice & Co.
Houston	Thomas Rice & Co.